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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES WATERKEEPER,
a public benefit non-profit corporation,

Plaintiff,

vs.

UNIVERSITY OF CALIFORNIA, LOS
ANGELES, a public entity,

Defendant.

Case No. 2:23-cv-07329

**NOTICE OF LODGING OF
DEPARTMENT OF JUSTICE
LETTER OF NON-OBJECTION; and
REQUEST FOR ENTRY OF
[PROPOSED] CONSENT DECREE**

On November 16, 2023, Plaintiff Los Angeles Waterkeeper ("LA Waterkeeper")

1 and Defendant University of California, Los Angeles (“UCLA”) (collectively the
2 “Parties”) filed a [JOINT] NOTICE OF SETTLEMENT AND FEDERAL AGENCY
3 45-DAY REVIEW PERIOD (“Notice of Settlement”) (Dkt. 16). The Notice of
4 Settlement informed the Court that: a) the Parties had executed a execute a [Proposed]
5 Order and Consent Decree (“Consent Decree”) that, if entered, will result in the full
6 settlement of all claims; and b) pursuant to 40 C.F.R. 135.5, the Court may not take
7 any action on the Consent Decree until the U.S. Department of Justice and the U.S.
8 Environmental Protection Agency (“Federal Agencies”) have concluded a 45-day
9 review and comment period of the proposed settlement instrument.

10 On November 15, 2023, the Parties received notice by email that the Federal
11 Agencies had received the Consent Decree and determined that the 45-day review and
12 comment period would end on December 29, 2023.

13 On December 11, 2023, the U.S. Department of Justice served the Parties with a
14 “no objection” letter by email. The “no objection” letter, which is filed concurrently
15 herewith as Exhibit 2, states that the Federal Agencies do not object to, or otherwise
16 oppose, the entry of the [Proposed] Consent Decree.

17 All pre-requisite actions having been completed, Plaintiff respectfully requests
18 that this Court enter the Consent Decree filed concurrently herewith, combined in a
19 single PDF, as Exhibit 1.

20 DATED: *December 18, 2023*

21 SYCAMORE LAW, INC.

22 by: /s/ Daniel Cooper
23 Daniel Cooper
24 Attorneys for Plaintiff